

# EXHIBIT B

**From:** Micah E. Ticatch

**Sent:** Thursday, May 15, 2025 9:55 AM

**To:** Brenda Widman <BWidman@nfclegal.com>; John Harding <jharding@islerdare.com>; John Remy <john.remy@jacksonlewis.com>; Burns, Eric P. (DC Region) <eric.burns@jacksonlewis.com>; Testo, Alyssa (DC) <alyssa.testo@jacksonlewis.com>; Dan McCoy <dmccoy@fenwick.com>; RSwaffordHarris@fenwick.com; rvieth@hirschlerlaw.com

**Cc:** Kegan Andeskie <KAndeskie@nfclegal.com>; Stacy Landau <slandau@nfclegal.com>; Sharina Rodriguez <SRodriguez@nfclegal.com>

**Subject:** RE: 11:59 v. Infinitive

Stacy/Kegan,

I have reviewed your initial disclosures, and these do not appear to comply with Rule 26(a)(1)(A)(iii). The rule requires you to provide *computation* of each category of damages claimed. You have not done so. You have not even provided any amounts-- let alone computations. You are also required to produce the documents on which each computation is based. I understand from your prior representations, that you have built a damages model. That is the kind of information that needs to be provided.

Please let me know if you have some time this morning to discuss.

**Micah E. Ticatch**

1945 Old Gallows Road, Suite 650

Vienna, Virginia 22182

Direct: 703-663-1308

Fax: 703-748-2695



**From:** Brenda Widman <[BWidman@nfclegal.com](mailto:BWidman@nfclegal.com)>

**Sent:** Wednesday, May 14, 2025 4:30 PM

**To:** Micah E. Ticatch <[mticatch@islerdare.com](mailto:mticatch@islerdare.com)>; John Harding <[jharding@islerdare.com](mailto:jharding@islerdare.com)>; John Remy <[john.remy@jacksonlewis.com](mailto:john.remy@jacksonlewis.com)>; Burns, Eric P. (DC Region) <[eric.burns@jacksonlewis.com](mailto:eric.burns@jacksonlewis.com)>; Testo, Alyssa (DC) <[alyssa.testo@jacksonlewis.com](mailto:alyssa.testo@jacksonlewis.com)>; Dan McCoy <[dmccoy@fenwick.com](mailto:dmccoy@fenwick.com)>; RSwaffordHarris@fenwick.com; [rvieth@hirschlerlaw.com](mailto:rvieth@hirschlerlaw.com)

**Cc:** Kegan Andeskie <[KAndeskie@nfclegal.com](mailto:KAndeskie@nfclegal.com)>; Stacy Landau <[slandau@nfclegal.com](mailto:slandau@nfclegal.com)>; Sharina Rodriguez <[SRodriguez@nfclegal.com](mailto:SRodriguez@nfclegal.com)>

**Subject:** 11:59 v. Infinitive

Good afternoon Counsel,

On behalf of Stacy Landau, Esq., attached please find correspondence to your attention in the above matter.

Should you have any difficulty with the attachment, please feel free to contact me.

Thank you.

Brenda

**Brenda Widman** | Senior Paralegal

---

---

Chatham Executive Center | 26 Main Street | Suite 202 | Chatham | NJ | 07928  
Office 973.665.9100 | Direct 973.507.7663 | Fax 973.665.9101  
[BWidman@nfclegal.com](mailto:BWidman@nfclegal.com) | [nfclegal.com](http://nfclegal.com)



Employment Law Solutions That Work.

**WBENC Certified and  
a Proud Member of NAMWOLF**

This message is intended solely for the use of the individual or entity to which it is addressed and may contain information that is confidential, privileged and/or exempt by law from disclosure. If you are not the intended recipient, you are hereby notified that any further dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please contact the sender immediately and delete all copies. Thank you.